

## **U.S. Department of Justice**

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

May 12, 2020

## **BY EMAIL**

The Honorable Valerie E. Caproni United States District Court Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: United States v. Carmelo Velez, et al., 19 Cr. 862 (VEC)

Dear Judge Caproni:

We write pursuant to the Court's order of May 6, 2020, in which the Court adjourned the May 14 status conference in this case and directed the parties to meet and confer about next steps. The parties have conferred and respectfully propose that the Court schedule a new status conference for a date in August that is convenient for the Court. As the Court is aware, the COVID-19 pandemic has limited the extent to which the defendants can confer with counsel, review discovery, consider motions, and discuss potential dispositions with the Government. The parties are hopeful that, between now and August, we can reach a point where we can advise the Court of a realistic schedule for motions and trial. We also respectfully request that the Court exclude time between today's date and the date of the status conference pursuant to the Speedy Trial Act. Defense counsel have consented to this request.

Respectfully submitted,

GEOFFREY S. BERMAN United States Attorney

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